

Message

From: Kulik, Ed (E.C.) [ekulik@ford.com]
Sent: 12/8/2017 8:37:50 PM
To: Cullen, Daniel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0feb8e3bbb3943a9afc1cbe32e40e3bc-Cullen, Dan]
Subject: RE: FE on CI powered FSPU

Hi Dan,

Thank you for the reference and clarifications. We'll proceed accordingly. Hopefully we won't have any further questions.

The plan for the confirmatory testing sounds good as well. I'm pretty sure the lower axle ratio is the higher volume variant, but I'll confirm and let you know.

Thanks and have a good weekend!

Ed

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From: Cullen, Daniel [mailto:Cullen.Daniel@epa.gov]
Sent: Friday, December 08, 2017 3:25 PM
To: Kulik, Ed (E.C.) <ekulik@ford.com>
Subject: FE on CI powered FSPU

Ed,

This is a follow up to my voicemail message.

Guidance document CD-15-22 directs the manufacturer to use good engineering judgement to determine whether or not to run a manufacturer confirmatory test on a FEDV that is powered by diesel fuel. In this case, I would recommend that Ford compare the fuel economy values obtained from the test FEDV to your internal targets. If you exceed your target FE by 3% or more, you should confirm the results with a second test. If not, you do not need to confirm. However, note that the same guidance document has values for FSPU fuel economy leaders. If you exceed those, I believe you would need to confirm your results.

Second, I understand one property will be used to do fuel economy tests with different axle ratios. What I would suggest is that you determine what the high selling axle will be (I understand this is a guess at this time). Please tell me which configuration is projected to have higher sales before you start testing. The first test should then be with the **lower** selling axle. Then, swap the axle and test the highest selling axle. Please then submit all the results. I will confirm the configuration with the highest projected sales, which should be the condition of the property after all testing is completed.

Please let me know if you agree, and if you have any questions. There may be other acceptable approaches.

Sincerely,

Dan